

UNITED STATES COURT OF APPEALS  
FOR THE SECOND CIRCUIT

-----X	:
NATIONAL LABOR RELATIONS BOARD,	:
	:
Petitioner,	:
	:
v.	:
	:
ATELIER CONDOMINIUM AND COOPER	:
SQUARE REALTY, as joint employers,	:
	:
Respondents.	:
	:
	:
-----X	:

Docket Nos. 14-4692, 15-95

**ANSWER TO APPLICATION  
FOR ENFORCEMENT**

Respondents, Atelier Condominium and Cooper Square Realty, hereby answer Petitioner National Labor Relations Board’s (“NLRB”) Application for Enforcement of the NLRB’s Decision and Order, dated November 26, 2014, in the matter of Atelier Condominium and Cooper Square Realty, as Joint Employers, Case Nos. 02-CA-39459, 02-CA-039575 and 02-CA-040066, published at 361 NLRB No. 111, as follows:

1. Admit that this Court has jurisdiction over the NLRB’s Application for Enforcement and that venue is proper in this Circuit.
2. Deny that they violated the National Labor Relations Act, as alleged in the NLRB’s Decision and Order.
3. Deny that the factual findings contained in the NLRB’s Decision and Order are supported by substantial evidence on the record and, further, deny that the legal conclusions contained in the NLRB’s Decision and Order have a reasonable basis in law.
4. Deny that the NLRB’s Decision and Order should be enforced, in whole or in part.

Wherefore, Respondents respectfully request that the NLRB's Application for Enforcement be denied and that they be granted such other and further relief as this Court may find to be just and proper.

Dated: New York, New York  
January 28, 2015

Respectfully submitted,  
CLIFTON BUDD & DeMARIA, LLP

By: /s/ Robert A. Sparer

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